

## EXHIBIT J

### Index of Platta-Gray Communications

1. June 22, 2021 Gray emails Team re Covid benefits being reduced since vaccinations are widely available and “have demonstrated safety and efficacy,” so temporary PTO and other benefits were ended.
2. July 27, 2021 Gray emails Gray Team re “We are pleased to share that the majority of Gray employees, and virtually your entire senior leadership at stations, etc., are fully vaccinated, but employees against adding new positive cases. “Everyone dying from COVID 19 today has not been vaccinated.”
3. August 6, 2021 Gray emails Ladies and Gentlemen that Gray has strongly encouraged everyone to get vaccinated. A small number of Gray vaccinated employees are having “breakthrough” infections, but have milder symptoms than the unvaccinated. “We know that the approved COVID19 vaccines are extremely effective in preventing serious illness and reducing the spread of the coronavirus.
4. August 16, 2021 **Gray announces important new Vaccine Mandate policy.**  
  
Vaccines are now mandated “UNANIMOUSLY” BY Senior Leadership. Vaccines must be done by September 15<sup>th</sup> for managers, and October 1<sup>st</sup> for everyone else, **as a condition of employment.** “We will grant reasonable accommodations where warranted.” Non-exempt employees will be paid for their time to get the Vax.

5. August 25, 2021 GM Holly Steuart writes to the unvaccinated saying let her know plans to get vaccinated or not, reminding them that she cannot grant an accommodation and to send request to Sharel Bend. Reminds of Sept. 15<sup>th</sup> and Oct 1<sup>st</sup> deadlines and that Employees will not have jobs if not vaccinated by deadline.
6. August 25, 2021 Platta emails Sharel Bend requesting to speak with her regarding what is going on.
7. August 25, 2021 Platta receives “**Automatic reply: Mandate & exemptions.**” from Sharel Bend: Your message will be answered in the order it was received.
8. August 26, 2021 Sharel Bend emails Platta she is tied up for next few days but will be happy to answer any questions via email.
9. September 3, 2021 Platta request religious exemption form from Sharel Bend.
10. September 6, 2021 Sharel Bend forwards Platta religious accommodation request for and asks for return by *Sept 21<sup>st</sup>*. “We will review to determine if a reasonable accommodation can be met.” **[No mention of *discussion* to determine if reasonable accommodation can be determined.]**  
  
September 9, 2021 Platta forwards to Sharel Bend his completed religious accommodation form.
11. September 11, 2021 Gray HR writes “Dear Gray Supervisor” saying no accommodation is possible because job “requires close

contact with other individuals.” Repeats that no vaccination means “not qualified: to remain employed.

12. September 12, 2021 Platta forwards to GM Holly Steuart Sept 11<sup>th</sup> Dear Gray Supervisor email denying accommodation saying “You need to know.”

September 13, 2021 Platta writes Holly Steuart saying he is in the station c c and 11:30 is perfect [to meet with her]

13. September 13, 2021 Platta writes Sharel Bend with numerous questions re Vaccine mandate and coverage for adverse reactions to the Vaccine, what would be listed as cause for termination if he does not take Vaccine, what about contract, severance, his 36 years of employment, unemployment insurance, health insurance—Time is of the essence due to need for informed consent.

**No response to this email.**

14. **October 13-14, 2021 Platta writes Holly Steuart re he has to make a living asking if high school play by play work would violate non-compete.**

**Holly Steuart consults Legal department and they conclude, yes, “high school play-by-play would violate the non-compete.”**

**Jennifer Sigmon**

---

**From:** Dave Platta <Dave.Platta@wtvm.com>  
**Sent:** Tuesday, September 14, 2021 11:50 AM  
**To:** plattad@email.com  
**Subject:** Fwd: Change to COVID-Related Benefits

Sent from my iPhone

Begin forwarded message:

**From:** GrayTV - HR Communications <hr.comm@gray.tv>  
**Date:** June 22, 2021 at 10:31:10 AM EDT  
**Subject:** Change to COVID-Related Benefits

Team,

Thank you to every employee for your perseverance, patience, hard work and understanding as we have all navigated the COVID 19 pandemic together. It is wonderful to announce that our new case count for employee's with COVID has dropped dramatically since the vaccines have become widely available. For several weeks we have experienced no new cases, and that is thanks to your willingness to vaccinate and to follow safety protocols. Well done!

Since early last year, Gray has provided Special PTO for those with or exposed to the coronavirus that causes COVID-19. Additionally, all medical claims related to care for those with the virus were exempt from deductibles and co-insurance within our group medical plans. Now that our new case count has dropped dramatically, and that coronavirus vaccinations are widely available and have demonstrated safety and efficacy, both of these temporary measures will end on June 30, 2021.

As our vaccination numbers continue to rise, more and more employees have been able to return safely to our workspaces. We expect that trend to continue and appreciate your cooperation and flexibility as we work to accommodate each unique situation as best as we can.

**Jennifer Sigmon**

---

**From:** Dave Platta <Dave.Platta@wtvm.com>  
**Sent:** Sunday, September 12, 2021 11:01 PM  
**To:** plattad@email.com  
**Subject:** Fwd: Vaccination Information at Gray

Sent from my iPhone

Begin forwarded message:

**From:** GrayTV - HR Communications <hr.comm@gray.tv>  
**Date:** July 27, 2021 at 1:51:12 PM EDT  
**Subject:** Vaccination Information at Gray

Dear Gray Team,

We are very pleased to share that the majority of Gray employees, and virtually your entire senior leadership at stations, production companies, and corporate, are fully vaccinated against the COVID-19 virus. THANK YOU to all of you who have taken this step to protect yourselves, your loved ones, your coworkers, and your communities.

**\*\* If you are fully vaccinated and have not yet shared this status with HR, please do so today. \*\***

While our high vaccination rate is excellent news, our employee family is again adding new positive cases with serious health consequences. Worse, we continue to experience tragic loss of life among our employees and their immediate families as a result of COVID-19. Some of our locations have extremely high rates of vaccination, and others are low.

It is normal for people to have concerns about new medicines and the possibility of side effects. In this case, we know that vaccines are safe and effective against serious symptoms resulting from the coronavirus while the side effects are minor and, in any event, much less risky than actually contracting COVID-19. As you all know, virtually everyone dying from COVID-19 today has not been vaccinated.

Some of our employees may be unable to be vaccinated because of a disability or closely held religious belief. The single best way to protect this group, as well as those who cannot receive a vaccine at this time such as children, is to increase the vaccination rate for all others who are eligible.

If you have not yet been vaccinated, please get vaccinated without delay. Do it to protect your loved ones, your colleagues, your neighbors, your friends.

For expert guidance and information about COVID-19 vaccines, the CDC has lots of helpful information:

[https://www.cdc.gov/coronavirus/2019-ncov/vaccines/kevthingstoknow.html?s\\_cid=11392:cdc%20vaccine:sem.ga:p:RG:GM:gen:PTN:FY21](https://www.cdc.gov/coronavirus/2019-ncov/vaccines/kevthingstoknow.html?s_cid=11392:cdc%20vaccine:sem.ga:p:RG:GM:gen:PTN:FY21)



**Jennifer Sigmon**

---

**From:** Dave Platta <Dave.Platta@wtvm.com>  
**Sent:** Sunday, September 12, 2021 11:01 PM  
**To:** plattad@email.com  
**Subject:** Fwd: New Vaccination Policy at Gray Television

Sent from my iPhone

Begin forwarded message:

**From:** GrayTV - HR Communications <hr.comm@gray.tv>  
**Date:** August 6, 2021 at 10:37:34 AM EDT  
**Subject:** New Vaccination Policy at Gray Television

Ladies and Gentlemen:

Gray Television has strongly encouraged everyone to get vaccinated against the coronavirus without delay to protect themselves, their families, their colleagues, and their local communities. Unfortunately, as everyone knows, the COVID-19 public health crisis is getting worse in too many communities across the country.

Here at Gray, our workforce has started to experience a small yet increasing number of “breakthrough” infections of the fully vaccinated, apparently as a result of the Delta variant. Importantly, these cases are not resulting in the same level of serious symptoms, illness, or hospitalizations as those experienced by our unvaccinated employees. Nevertheless, they are a source of significant concern for us because fully vaccinated employees who contract the Delta variant of the coronavirus may be able to transmit this more dangerous variant to other individuals, including those unable to get vaccinated in the same household such as children and those with compromised immune systems.

We know that the approved COVID-19 vaccines are extremely effective in preventing serious illness and reducing the spread of the coronavirus. We are pleased to assure all of our employees that Gray’s entire senior leadership team and every General Manager are fully vaccinated (other than one special accommodation).

At this time, to better safeguard the health of our employees and their families; our customers and visitors; and the community at large, we are today adopting a new vaccination policy.

**Effective September 1, 2021, Gray Television will require, as a condition of employment, that newly hired employees, whether part-time or full-time, be “fully vaccinated” against the coronavirus (as defined by the CDC).**

We will grant reasonable accommodations and short extensions of the deadline where warranted. Requests for either accommodations or extensions must be made to the location’s

Employee Relations Point of Contact (that is, to Maurice, Sharel or Shavonne and not to any other manager or supervisor) prior to the start date of a new employee. Our new vaccination policy will be administered in a manner that complies with applicable laws and the most recent guidance from applicable authorities, including the Centers for Disease Control and Prevention (CDC), the Equal Opportunity Commission (EEOC) and local public health authorities.

We are not adopting a broader vaccination mandate for all current employees at this time. As we have done since the start of the pandemic, Gray Television's leadership will continue to monitor closely the crisis and continue to adjust our coronavirus policies and protocols as necessary until this crisis is finally behind us.

- Gray Senior Leadership

**Jennifer Sigmon**

---

**From:** Dave Platta <Dave.Platta@wtvm.com>  
**Sent:** Sunday, September 12, 2021 11:00 PM  
**To:** plattad@email.com  
**Subject:** Fwd: Important Announcement Of Vaccination Policy

Sent from my iPhone

Begin forwarded message:

**From:** GrayTV - HR Communications <hr.comm@gray.tv>  
**Date:** August 16, 2021 at 8:04:43 AM EDT  
**Subject:** Important Announcement Of Vaccination Policy

At Gray Television, we continue to make the health and safety of our employees our highest priority. Unfortunately, as everyone knows, the COVID-19 public health crisis is getting worse in too many communities across the country.

We know that the approved COVID-19 vaccines are extremely effective in preventing serious illness and reducing the spread of the coronavirus. After extensive discussion among the GMs and officers this week, these individuals UNANIMOUSLY concluded that the increasingly rapid spread of the coronavirus poses **an unfair risk** to fellow employees and their family members who are not eligible to get vaccinated.

This group therefore UNANIMOUSLY discussed, developed, and then approved expanding our vaccination policy to all employees in two phases as follows:

1. Effective September 15, 2021, Gray Television will require, as a condition of employment, that every employee who occupies a "manager" position in our company be "fully vaccinated" against the coronavirus (as defined by the CDC); and
2. Effective October 1, 2021, Gray Television will require all full-time and part-time employees, as well as all outside contractors, tenants, and guests who enter our workspaces, to be "fully vaccinated" against the coronavirus (as defined by the CDC).

We will grant reasonable accommodations and short extensions of the deadline where warranted. Requests for either accommodations or extensions must be made to the location's Employee Relations Point of Contact (that is, to Maurice, Sharel or Shavonne and not to any other manager or supervisor). If you don't know who your Employee Relations contact is, please ask your General Manager or send an email to [hr@gray.tv](mailto:hr@gray.tv).

Our new vaccination policy will be administered in a manner that complies with applicable laws and the most recent guidance from applicable authorities, including the Centers

J-4



for Disease Control and Prevention (CDC), the Equal Opportunity Commission (EEOC) and local public health authorities.

The company will pay non-exempt employees for time spent receiving the vaccination, although any scheduling changes need to be approved by the employee's supervisor.

We thank you in advance for taking this step to protecting yourself, your coworkers, your families, and your communities. Gray Television's leadership will continue to monitor the latest information about COVID-19 and will continue to adjust our coronavirus policies and protocols as necessary until this crisis is finally behind us.

- Gray Leadership Team

Jeanne Bynum Hipes

---

**From:** Dave Platta <Dave.Platta@wtvm.com>  
**Sent:** Wednesday, August 25, 2021 10:48 AM  
**To:** plattad@email.com  
**Subject:** Fwd: \*VERY IMPORTANT\* - PLEASE RESPOND TODAY BY NOON

Sent from my iPhone

Begin forwarded message:

**From:** Holly Steuart <Holly.Steuart@wtvm.com>  
**Date:** August 25, 2021 at 10:41:19 AM EDT  
**To:** Holly Steuart <Holly.Steuart@wtvm.com>  
**Cc:** Aaron Lee <Aaron.Lee@wtvm.com>, Brian Correll <Brian.Correll@wtvm.com>, Pamela Biddle <Pamela.Biddle@wtvm.com>, Scott Fussell <Scott.Fussell@wtvm.com>, Deloris Washington <Deloris.Washington@wtvm.com>  
**Subject:** \*VERY IMPORTANT\* - PLEASE RESPOND TODAY BY NOON

If you are receiving this email, it's because I have not heard from you yet regarding your plans to get vaccinated or not get vaccinated, or to seek an accommodation from corporate HR. It's vital that I hear from you today.  
I have copied the department heads and sent a separate email, so they are aware of this request and to help me follow up with you.

Please respond to this email ASAP.  
Let me know, if you plan to get vaccinated and if so, when.  
Or let me know you do not plan to be vaccinated, or that you will seek an accommodation.  
Remember, I can't grant an accommodation.  
Please email [sharel.bend@gray.tv](mailto:sharel.bend@gray.tv) ASAP if you want an exemption. She will evaluate your request.

Remember: Managers have until 9/15 to be fully vaccinated.  
All other employees have until October 1 to be fully vaccinated.

Gray is making vaccination (or an accommodation) mandatory after October 1.  
That means if someone has not followed through on this process, they will not have a job after October 1.

I don't want to lose any of you.  
Please respond as soon as you can. I'm happy to talk things out with people, but you need to act quickly.  
Thanks.

**Holly Steuart**

Vice President & General Manager

Office: 706-494-5420

Cell: 706-341-9994

1909 Wynnton Rd. Columbus GA 31906



COVERAGE YOU CAN COUNT ON



**Jennifer Sigmon**

---

**From:** Dave Platta <Dave.Platta@wtvm.com>  
**Sent:** Wednesday, August 25, 2021 12:01 PM  
**To:** plattad@email.com  
**Subject:** Fwd: Mandate & exemptions

Sent from my iPhone

Begin forwarded message:

**From:** Dave Platta <Dave.Platta@wtvm.com>  
**Date:** August 25, 2021 at 11:17:56 AM EDT  
**To:** Sharel Bend <sharel.bend@gray.tv>  
**Subject:** Mandate & exemptions

I'd like to speak with you about what's going on at a time that would be mutually convenient.

Would some time Monday work for you?

Thanks for your time.

Sent from my iPhone

J-6

Jeanne Bynum Hipes

---

**From:** Dave Platta <Dave.Platta@wtvm.com>  
**Sent:** Wednesday, August 25, 2021 12:01 PM  
**To:** plattad@email.com  
**Subject:** Fwd: Automatic reply: Mandate & exemptions

Sent from my iPhone

Begin forwarded message:

**From:** Sharel Bend <sharel.bend@gray.tv>  
**Date:** August 25, 2021 at 11:18:01 AM EDT  
**To:** Dave Platta <Dave.Platta@wtvm.com>  
**Subject:** Automatic reply: Mandate & exemptions

Thank you for your email. Your message is important. Due to the increased volume, your email message will be answered in the order it was received.

Take care and stay safe,

Sharel

J-7

**Jennifer Sigmon**

---

**From:** Dave Platta <Dave.Platta@wtvm.com>  
**Sent:** Sunday, September 12, 2021 11:03 PM  
**To:** plattad@email.com  
**Subject:** Fwd: Mandate & exemptions

Sent from my iPhone

Begin forwarded message:

**From:** Sharel Bend <sharel.bend@gray.tv>  
**Date:** August 26, 2021 at 1:13:19 PM EDT  
**To:** Dave Platta <Dave.Platta@wtvm.com>  
**Subject:** RE: Mandate & exemptions

Good Morning Dave,

I will be tied up for the next few days but will be happy to answer any questions you have via email.  
Once received, if it requires a phone call I can reach out at that time.

Thanks,  
Sharel

This message and attachments may contain confidential/privileged information. If you are not the intended recipient, disclosure, copying, distribution, or use of information contained in this message or attachment is prohibited. If you received this message in error, do not read, copy, or forward and permanently delete all copies and attachments and notify sender immediately.

-----Original Message-----

**From:** Dave Platta <Dave.Platta@wtvm.com>  
**Sent:** Wednesday, August 25, 2021 10:18 AM  
**To:** Sharel Bend <sharel.bend@gray.tv>  
**Subject:** Mandate & exemptions

I'd like to speak with you about what's going on at a time that would be mutually convenient.

Would some time Monday work for you?

Thanks for your time.

Sent from my iPhone

J-8



*This message and attachments may contain confidential/privileged information. If you are not the intended recipient, disclosure, copying, distribution, or use of information contained in this message or attachment is prohibited. If you received this message in error, do not read, copy, or forward and permanently delete all copies and attachments and notify sender immediately.*

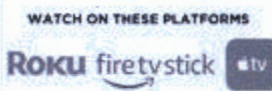
**From:** Dave Platta <Dave.Platta@wtvm.com>  
**Sent:** Friday, September 3, 2021 3:19 PM  
**To:** Sharel Bend <sharel.bend@gray.tv>  
**Subject:** Vaccine

I'd like to request the religious exception form. Please let me know what else you need from me.

Thank you.



Dave Platta | Sports Director | WTVM-TV WXTX-TV | ☎ : 706.315.0176 | ✉ : [dave.platta@wtvm.com](mailto:dave.platta@wtvm.com)



Jeanne Bynum Hipes

---

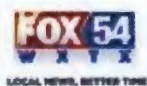
**From:** Dave Platta <Dave.Platta@wtvm.com>  
**Sent:** Thursday, September 9, 2021 9:36 AM  
**To:** Sharel Bend  
**Subject:** Re: Vaccine  
**Attachments:** Religious Accommodation Request Form FILLED OUT.docx; Religious Accommodation Request Form FILLED OUT.docx

Attached is my religious accommodation form requesting exemption from the vaccine mandate.

Thank you.



Dave Platta | Sports Director | WTVM-TV WCTX-TV | ☎: 706.315.0176 | ✉: [dave.platta@wtvm.com](mailto:dave.platta@wtvm.com)



---

**From:** Sharel Bend <sharel.bend@gray.tv>  
**Sent:** Monday, September 6, 2021 11:59 PM  
**To:** Dave Platta <Dave.Platta@wtvm.com>  
**Subject:** RE: Vaccine

Dave,

Attached is the religious accommodation request form. Please return the form to me by September 21<sup>st</sup>, which is 15 days from today. Once received, we will review to determine if a reasonable accommodation can be met.

Thanks,  
Sharel



**Sharel Bend**  
Gray Television, Inc.  
Director, Human Resources  
201 Monroe Street  
RSA Tower, 20<sup>th</sup> Floor  
Montgomery, AL 36104  
Office: 334.206.1440  
Cell: 334.531.0460  
Email: [sharel.bend@gray.tv](mailto:sharel.bend@gray.tv)  
Website: [www.gray.tv](http://www.gray.tv)

J-10

**From:** GrayTV - HR Communications <[hr.comm@gray.tv](mailto:hr.comm@gray.tv)>  
**Date:** September 11, 2021 at 1:40:29 PM EDT  
**To:** GrayTV - HR Communications <[hr.comm@gray.tv](mailto:hr.comm@gray.tv)>  
**Subject: URGENT: Update Regarding Your Vaccination Status**

Dear Gray Supervisor,  
The health and safety of our employees is a top priority. As you know, to help make our work environment safer, Gray Television adopted a vaccine policy in August that  
requires, among other things, that all Supervisors to be FULLY VACCINATED against COVID-19 (as defined by the CDC) no later than September 15, 2021.

We have reviewed your request for a reasonable accommodation from this condition of employment. Your job position, however, requires close contact with other individuals to fulfill the essential duties of your job. This means that no reasonable accommodation is available for your current role. Therefore, if you are not fully vaccinated against COVID-19 by September 15, 2021, you will not be qualified to remain employed with Gray Television on that date.

Nevertheless, if you are not fully vaccinated but now decide to start or complete the vaccination regime, you may request a short extension of the fully vaccinated deadline to come into compliance with the policy. To request this extension, you will need to receive, and provide proof of, the first vaccine shot and submit a timely request for this extension to [vaccine@gray.tv](mailto:vaccine@gray.tv) prior to September 15, 2021. For vaccines that requires two doses, you will need to receive the second dose within the period specified for the vaccine you receive and provide us with proof of a timely second vaccination shot to extend the deadline through the end of the vaccination regime. An employee who is not fully vaccinated during a temporary deadline extension must continue to comply with all public health precautions against the coronavirus (face-covering, social distancing, temperature checks, and the like) while within any Gray workspace or within proximity of a Gray employee, customer, contractor, or other individual for work purposes. In addition, each employee who is not fully vaccinated will need to submit a negative COVID 19 PCR test to [vaccine@gray.tv](mailto:vaccine@gray.tv) at least once each week. Violations of any of these public health precautions will lead to disciplinary action up to and including termination.

If you have any questions about this notice, please email our vaccination team at [vaccine@gray.tv](mailto:vaccine@gray.tv).

J-11

**Jennifer Sigmon**

---

**From:** Dave Platta <Dave.Platta@wtvm.com>  
**Sent:** Monday, September 13, 2021 12:05 PM  
**To:** Dave Platta  
**Subject:** FW: URGENT: Update Regarding Your Vaccination Status

**From:** Dave Platta  
**Sent:** Monday, September 13, 2021 11:19 AM  
**To:** Holly Steuart <Holly.Steuart@wtvm.com>  
**Subject:** Re: URGENT: Update Regarding Your Vaccination Status

Actually, I'm at the station and 11:30 is perfect.

Sent from my iPhone

On Sep 13, 2021, at 11:08 AM, Holly Steuart <Holly.Steuart@wtvm.com> wrote:

Dave, I'm on a TMP call right now but when I'm done (11:30?) can I call you?

<image001.png>

<image002.png>

**From:** Dave Platta <Dave.Platta@wtvm.com>  
**Sent:** Sunday, September 12, 2021 8:06 PM  
**To:** Holly Steuart <Holly.Steuart@wtvm.com>  
**Subject:** Fwd: URGENT: Update Regarding Your Vaccination Status

You need to know.

Sent from my iPhone

Begin forwarded message:

**From:** GrayTV - HR Communications <hr.comm@gray.tv>  
**Date:** September 11, 2021 at 1:40:29 PM EDT  
**To:** GrayTV - HR Communications <hr.comm@gray.tv>  
**Subject:** URGENT: Update Regarding Your Vaccination Status

Dear Gray Supervisor,

The health and safety of our employees is a top priority. As you know, to help make our work environment safer, Gray Television adopted a vaccine policy in August that

J-12

**Jennifer Sigmon**

---

**From:** Dave Platta <Dave.Platta@wtvm.com>  
**Sent:** Monday, September 13, 2021 12:04 PM  
**To:** Dave Platta  
**Subject:** FW: Questions

**From:** Dave Platta  
**Sent:** Monday, September 13, 2021 12:04 PM  
**To:** Sharel Bend <sharel.bend@gray.tv>  
**Cc:** Holly Steuart <Holly.Steuart@wtvm.com>  
**Subject:** Questions

After the e-mail send on Saturday regarding denial of my religious exemption, I have questions that cover both possibilities.

**If I agree to the vaccination:**

1. If the approved vaccine "Comirnaty" is not available, are we still required to undergo vaccination with the still-under-EUA Pfizer-BioNTech COVID-19 vaccine? If so, under what U.S. or Georgia statute is a compelled vaccination under clinical trial conditions allowed?

2. In the event of an adverse reaction to the vaccine, who of the following would be legally liable?

- A. Gray Television
- B. The CDC
- C. The FDA
- D. My company insurance through Cigna
- E. Workman's Compensation
- F. The person administering the injection
- G. Disability insurance through Cigna or other entity
- H. Myself
- I. Other entity

3. How would insurance coverage of medical and other costs be handled, and who would be responsible for payment? Again, which of the above would be responsible for paying the costs?

4. If the answer turns out to be Cigna, how would payouts be handled and under what conditions? Should an injury be severe enough to incapacitate me, the Cigna printout of the Gray health plan is quite unclear. They describe different scenarios on page 31 under "Clinical Trials" and again on page 39 when they declare they're not responsible for continuing care. Who would be responsible for payments that aren't covered? Would the administration of the EUA-designated vaccine be considered a "clinical trial"?

5. If administered incorrectly by medical personnel who commit a violation of procedures, or if there's a problem because of storage temperature issues, who would then be liable, and would this affect the payout to me or my survivors?

J-13

6. It has already been demonstrated that booster shots will be needed because whatever protection the original vaccine confers wears off over time or is ineffective against virus mutations. Will I have to keep taking those boosters in the future to remain employed?

7. What method would be used to test for COVID in the interim between shots? Would you be using the PCR test?

**If I do not agree to the vaccination:**

1. What would be the listed as just cause for my termination of employment, and what would be the legal justification for the decision?
2. What about my current contract, which still has two years to run? And if there's a severance payment, would it take into account my 36 years of service to the station?
3. What would my status be for the collection of unemployment insurance?
4. What would happen to my health insurance with Cigna? When would that terminate?

Obviously, time is of the essence in getting the answer to these questions due to the need for informed consent.

Thanks for your time.



Dave Platta | Sports Director | WTVM-TV WXTX-TV | ☎: 706.315.0176 | ✉: [dave.platta@wtvm.com](mailto:dave.platta@wtvm.com)





----- Original Message -----

On Thursday, October 14th, 2021 at 12:15 PM, Holly Steuart <Holly.Steuart@wtvm.com> wrote:

Hi Dave,

I consulted our attorney just to be sure about the non-compete.

The language of the contract does prohibit any "internet" work.

If you look at section 10 of the employment agreement:

(10) Restrictive Covenants. Employee agrees that, while employed by Employer and for the one-year period following termination of employment, regardless of the reason for termination:

(a) Employee shall not perform any activities that are the same as or similar to the Services (as defined above) or such other services as performed by Employee for Employer within the two-year period preceding the termination of employment or make any personal appearances or authorize or permit the use of his/her name, image, voice, sobriquet, biography, recorded performance, picture, portrait, caricature, electrical transcription, tape, digitized image, animated image, audio file, graphic file, text file, compact disc recording, web page or other recording or likeness for or on behalf of any Competitor without the express prior written consent of Employer (which consent may be withheld at Employer's discretion). for purposes of this Section, the term "Competitor" means any television station, radio station, cable television facility or program or any other video delivery system (including, without limitation, broadcast, cable, satellite, or internet) that competes with Employer for viewers, advertisers, or the like within all or any portion of the Designated Market Area ("DMA") of the Station (as currently defined by Nielsen...)

V-14

So the legal opinion is that the high school play-by-play would violate the non-compete.

Please let me know if you want to discuss further.

Thanks.

**Holly Steuart**

Vice President & General Manager

Office: 706-494-5420

Cell: 706-341-9994

1909 Wynnton Rd. Columbus GA 31906



**From:** dplatta <dplatta@protonmail.com>  
**Sent:** Wednesday, October 13, 2021 12:32 PM  
**To:** Holly Steuart <Holly.Steuart@wtvm.com>  
**Subject:** Re: Questions?

I do have a question. I have to make a living, so I have non-compete clause questions.

If I do high school football play by play on webcasts, would that fall under the non-compete? And if I started a podcast, would that fall under the non-compete?

I'd never done either during my entire 36-year tenure at WTVM. Need an answer ASAP.

Thanks!

Sent with ProtonMail Secure Email.

----- Original Message -----

On Tuesday, October 12th, 2021 at 3:57 PM, Holly Steuart  
<[Holly.Steuart@wtvm.com](mailto:Holly.Steuart@wtvm.com)> wrote:

Hi Dave,

Hope all is well...

Just wondering if you had any questions about the severance agreement.

No rush, no pressure, just here to help...

**Holly Steuart**

Vice President & General Manager

Office: 706-494-5420

Cell: 706-341-9994

1909 Wynnton Rd. Columbus GA 31906



**CAUTION - EXTERNAL EMAIL** This message originated from outside Gray Television and may contain malicious content. Do not click links or open attachments unless you recognize the source of this email and know the content is safe.